

## **EXHIBIT “D”**

**From:** Piero Ruiz Rodriguez  
**To:** Jenn from Vegas Food & Fun  
**Cc:** Lauren Hausman  
**Subject:** RE: 08/29 Follow Up: Prepared Food Photos, Inc. v Circus Circus LV, LLC and Vegas Food & Fun

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Ms. Gregory,

Thank you for the notice of representation. Please have your attorney direct their letter to the lead attorney for this case – Ms. Hausman (copied above).

Regards,



**Piero Ruiz Rodriguez**

Copycat Legal PLLC  
3111 North University Drive,  
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**From:** Jenn from Vegas Food & Fun <[support@vegasfoodandfun.com](mailto:support@vegasfoodandfun.com)>  
**Sent:** Wednesday, August 30, 2023 3:32 PM  
**To:** Piero Ruiz Rodriguez <[piero@copycatlegal.com](mailto:piero@copycatlegal.com)>  
**Subject:** RE: 08/29 Follow Up: Prepared Food Photos, Inc. v Circus Circus LV, LLC and Vegas Food & Fun

External ([support@vegasfoodandfun.com](mailto:support@vegasfoodandfun.com))

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Hello,

I have discussed this matter with my attorney and he will send you a letter tomorrow.

Thank you,

Jennifer Gregory  
Vegas Food & Fun  
<https://vegasfoodandfun.com>

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**From:** Piero Ruiz Rodriguez <[piero@copycatlegal.com](mailto:piero@copycatlegal.com)>  
**Sent:** Tuesday, August 29, 2023 2:07 PM  
**To:** Jenn from Vegas Food & Fun <[support@vegasfoodandfun.com](mailto:support@vegasfoodandfun.com)>

**Subject:** 08/29 Follow Up: Prepared Food Photos, Inc. v Circus Circus LV, LLC and Vegas Food & Fun

Good afternoon, Ms. Gregory

Client has been losing patience and asked for an update on the below given the lack of movement. We are likely to discuss with them soon as to proceeding accordingly.

If you have an interest in resolving this matter amicably pre-suit, please contact me.

Regards,



**Piero Ruiz Rodriguez**

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**From:** Piero Ruiz Rodriguez

**Sent:** Tuesday, August 22, 2023 11:29 AM

**To:** 'Jenn from Vegas Food & Fun' <[support@vegasfoodandfun.com](mailto:support@vegasfoodandfun.com)>

**Subject:** 08/22 Follow Up: Prepared Food Photos, Inc. v Circus Circus LV, LLC and Vegas Food & Fun

Good morning, Ms. Gregory

I am following up on the below correspondence. Our preference is to resolve this matter of copyright infringement amicably through settlement discussions. Our client's photo appeared on the Vegas Food & Fun website apparently without a license.

Please advise if we can work to resolve this.

Regards,



**Piero Ruiz Rodriguez**

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**From:** Piero Ruiz Rodriguez  
**Sent:** Tuesday, August 15, 2023 10:47 AM  
**To:** 'Jenn from Vegas Food & Fun' <[support@vegasfoodandfun.com](mailto:support@vegasfoodandfun.com)>  
**Cc:** Lauren Hausman <[lauren@copycatlegal.com](mailto:lauren@copycatlegal.com)>  
**Subject:** RE: Prepared Food Photos, Inc. v Circus Circus LV, LLC and Vegas Food & Fun

Ms. Gregory,

Just following up on the below.

Thank you,



**Piero Ruiz Rodriguez**

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**From:** Piero Ruiz Rodriguez  
**Sent:** Tuesday, August 8, 2023 12:55 PM  
**To:** Jenn from Vegas Food & Fun <[support@vegasfoodandfun.com](mailto:support@vegasfoodandfun.com)>  
**Cc:** Lauren Hausman <[lauren@copycatlegal.com](mailto:lauren@copycatlegal.com)>  
**Subject:** RE: Prepared Food Photos, Inc. v Circus Circus LV, LLC and Vegas Food & Fun

Ms. Gregory,

We appreciate your correspondence in providing clarity to the situation. Unfortunately, the fact that the photograph was pulled from an official Facebook page for Circus Circus does not grant Vegas Food & Fun a license for use of our client's photograph. Thus, the matter constitutes copyright infringement. To resolve this matter amicably and pre-suit, I suggest that we proceed with settlement discussions.

While I cannot provide legal advice, I would encourage you to discuss the matter with an attorney, who is hopefully family or a friend (so you don't have to unnecessarily incur legal fees) and get a sense of what the potential liability is. Alternatively, you may consult (if available) with your General Liability Insurance for potential coverage of this matter. I'm happy to discuss, but please keep in mind that my client does not consider this matter closed. I am trying to guide the process to a peaceful resolution.

Thank you,



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**From:** Jenn from Vegas Food & Fun <[support@vegasfoodandfun.com](mailto:support@vegasfoodandfun.com)>

**Sent:** Tuesday, August 8, 2023 10:34 AM

**To:** Piero Ruiz Rodriguez <[piero@copycatlegal.com](mailto:piero@copycatlegal.com)>

**Cc:** Lauren Hausman <[lauren@copycatlegal.com](mailto:lauren@copycatlegal.com)>

**Subject:** RE: Prepared Food Photos, Inc. v Circus Circus LV, LLC and Vegas Food & Fun

Mr Rodriguez,

We do not have a contractual relationship with Circus Circus, but we only pull what they represented to be official images from their website or official Facebook page.

Thank you,

Jennifer Gregory  
Vegas Food & Fun  
<https://vegasfoodandfun.com>



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**From:** Piero Ruiz Rodriguez <[piero@copycatlegal.com](mailto:piero@copycatlegal.com)>

**Sent:** Thursday, August 3, 2023 10:10 AM

**To:** Jenn from Vegas Food & Fun <[support@vegasfoodandfun.com](mailto:support@vegasfoodandfun.com)>

**Cc:** Lauren Hausman <[lauren@copycatlegal.com](mailto:lauren@copycatlegal.com)>

**Subject:** RE: Prepared Food Photos, Inc. v Circus Circus LV, LLC and Vegas Food & Fun

Ms. Gregory,

Just following up on the below. I intend to work toward amicable resolution of the matter, but cannot do so without a return to our correspondence.

As a reminder, our preference is to resolve this matter amicably, but I cannot do so if you do not communicate with me regarding resolution.

Regards,



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**From:** Piero Ruiz Rodriguez

**Sent:** Thursday, July 27, 2023 5:56 PM

**To:** 'Jenn from Vegas Food & Fun' <[support@vegasfoodandfun.com](mailto:support@vegasfoodandfun.com)>

**Cc:** Lauren Hausman <[lauren@copycatlegal.com](mailto:lauren@copycatlegal.com)>

**Subject:** RE: Prepared Food Photos, Inc. v Circus Circus LV, LLC and Vegas Food & Fun

Good morning, Ms. Gregory

Just following up on the below. I hope we may discuss the matter to work toward resolving this amicably.

Thank you,



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**From:** Piero Ruiz Rodriguez

**Sent:** Thursday, July 20, 2023 2:42 PM

**To:** Jenn from Vegas Food & Fun <[support@vegasfoodandfun.com](mailto:support@vegasfoodandfun.com)>

**Cc:** Lauren Hausman <[lauren@copycatlegal.com](mailto:lauren@copycatlegal.com)>

**Subject:** RE: Prepared Food Photos, Inc. v Circus Circus LV, LLC and Vegas Food & Fun

Hello, Ms. Gregory

Thank you for providing the link below. I will reach out to Circus Circus (CC) regarding the link you provided. While I draft a follow up, can you please help clarify the relationship between Vegas Food & Fun and Circus Circus? I have some questions regarding the use of the photograph.

Is there a contractual relationship/express permission from Circus Circus for the use of photographs on their websites?

If photographs are otherwise selected on the presumption of CC's ownership, it appears Circus Circus's use of the photograph, and any subsequent uses, constitute infringement of our client's copyright.

Please let me know if you have any questions or concerns.

Regards,



**Piero Ruiz Rodriguez**

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**From:** Jenn from Vegas Food & Fun <[support@vegasfoodandfun.com](mailto:support@vegasfoodandfun.com)>

**Sent:** Wednesday, July 19, 2023 4:43 PM

**To:** Piero Ruiz Rodriguez <[piero@copycatlegal.com](mailto:piero@copycatlegal.com)>

**Cc:** Lauren Hausman <[lauren@copycatlegal.com](mailto:lauren@copycatlegal.com)>

**Subject:** RE: Prepared Food Photos, Inc. v Circus Circus LV, LLC and Vegas Food & Fun

Hello,

I have removed the image from our site, and looked back to see why we would have this photo. We only source photos from Shutterstock, Bigstock, and the official websites and pages of the company we are promoting. We never just take images from Google or other websites.

Circus Circus used this photo on their Facebook page back in 2013, representing that it was their image [here](#), which is where we got it. We thought it was an official Circus Circus image.

I apologize for the misunderstanding.

Thank you,

Jennifer Gregory  
Vegas Food & Fun  
[https://vegasfoodandfun.com](http://vegasfoodandfun.com)



**From:** Piero Ruiz Rodriguez <[piero@copycatlegal.com](mailto:piero@copycatlegal.com)>  
**Sent:** Friday, July 7, 2023 2:56 PM  
**To:** [support@vegasfoodandfun.com](mailto:support@vegasfoodandfun.com); [guestrelations@circuscircus.com](mailto:guestrelations@circuscircus.com)  
**Cc:** Lauren Hausman <[lauren@copycatlegal.com](mailto:lauren@copycatlegal.com)>  
**Subject:** Prepared Food Photos, Inc. v Circus Circus LV, LLC and Vegas Food & Fun

**FRE 408 SETTLEMENT COMMUNICATION**

Good evening,

Please see the attached letter, dated today. A copy will follow via FedEx.

Thank you,



**Piero Ruiz Rodriguez**

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